REMARKS

This Response, filed in reply to the Office Action dated September 13, 2006, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-4, 6-9, 11, 12, and 14-16 are all the claims pending in the application.

I. Claim Rejections under 35 U.S.C. § 103

Claims 9, 11-12 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Creutzmann et al. (U.S. Patent No. 4,780,731) in view of Ushirozawa (U.S. Patent No. 6,452,953) and Uebbing (U.S. Patent No. 4,982,203).

Claims 15 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Creutzmann et al. in view of Uebbing et al. and Takesue et al. (U.S. Patent No. 4,837,787).

II. Allowable Subject Matter

Claims 1-4 and 6-8 remain allowed.

While gratefully acknowledging the presence of allowable subject matter in the application, Applicant respectfully submits the following arguments in traversal of the prior art rejections.

Applicant's invention relates to a light exposure apparatus while applying temperature control of the light emitting elements. In a preferred embodiment, the temperature of each light element is measured, and as a further feature, corrections to compensate for temperature variation are provided via a table representing a relation between temperature and light output.

Turning to the newly cited art, Uebbing relates to an apparatus that takes into account temperature fluctuations of LED elements in a print head on a grouped basis. In particular, the

temperature of the devices are analyzed in groups as small as two light elements. Col. 4. : lines 29-32. Accordingly, Uebbing specifically teaches away from temperature measurements for each light element. In this regard, it is noted that Uebbing indicates the method and monitoring of Creutzmann to be expensive and inefficient. Col. 2, lines 5-11.

Applicant submits that the rejection over the combination of Creutzmann and Uebbing is improper because Uebbing effectively teaches away from its combination with Creutzmann. Even though both references are directed to temperature compensation, each reference takes a different approach. Creutzmann relies on a constant measurement of the light sources, which Uebbing dismisses as wasteful. One skilled in the art would not combine the teachings of Creutzmann and Uebbing for at least these reasons. Therefore, the obviousness rejection of independent claims 9, 11-12 and 15 should be withdrawn.

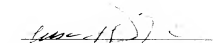
Furthermore, the claims describe monitoring of the temperature of each light source. In order to provide a more economical system, Uebbing specifically teaches that light devices are monitored for temperature in groups, with no fewer than two devices in a group. This clearly teaches away from temperature measurement for each light source as described by claims 9 and 11-12. Moreover, Uebbing teaches away from its combination with Ushirozawa which relies on individual temperature measurement. Therefore, claims 9 and 11-12 are patentable for these additional reasons.

The remaining rejected claims 14 and 16 are patentable based on their dependency. Takesue does not make up for the deficiencies of Creutzmann, Uebbing and Ushirozawa.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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